

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

FILED

JAN 14 2019

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

In the Matter of the Seizure of)
(Briefly describe the property to be seized))

Case No. 3:18-MJ- 2215

Funds on deposit in Pershing Brokerage)
investment accounts in the name of Danny)
Robinson, up to the amount of \$50,500 (plus any)
associated earnings or interest on that amount))

APPLICATION FOR A WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE

I, a federal law enforcement officer or attorney for the government, request a seizure warrant and state under penalty of perjury that I have reason to believe that the following property in the Eastern District of Tennessee is subject to forfeiture to the United States of America under 21 U.S.C. §§ 853, 881(a)(6), 18 U.S.C. §§ 981(a)(1)(C), 981(a)(1)(A) and/or 18 U.S.C. § 982(a)(1). (describe the property):

Funds on deposit in Pershing Brokerage investment accounts, in the name of Danny Robinson, up to the amount of \$50,500 (plus any associated earnings or interest on that amount); which is property that constitutes and/or is derived from proceeds obtained directly or indirectly as a result of the offenses of 21 U.S.C. §§ 841 and 846 and any property involved in the offenses of 18 U.S.C. § 1957 and any property traceable to such property.

THE ABOVE-REFERENCED FINANCIAL INSTITUTION IS HEREBY COMMANDED to effect the seizure of the contents of the above-referenced account and to refuse the withdrawal of any amount from the account by anyone other than duly authorized law enforcement agents, promptly provide officers or contractors of the Internal Revenue Service with the current account balance, and continue to accrue any deposits, interest, dividends, and any other amount credited to the account fourteen (14) days from the seizure of the account.

The application is based on these facts:

The Affidavit attached hereto and incorporated herein by reference sets forth probable cause for the seizure of the property in accordance with civil forfeiture pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 881 and in accordance with criminal forfeiture pursuant to 21 U.S.C. § 853(e) and (f) and 18 U.S.C. § 982(b)(1). The property is subject to civil forfeiture in accordance with 18 U.S.C. §§ 981(a)(1)(C), 981(a)(1)(A) and 21 U.S.C. § 881(a)(6) and is subject to criminal forfeiture in accordance with 21 U.S.C. § 853 and 18 U.S.C. § 982(a)(1).

Crystal Centers
Applicant's signature

Crystal Centers, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 12/12/18

Bruce Cuyton
Judge's signature

City and state: Knoxville, Tennessee

Bruce Cuyton

United States Magistrate Judge
Printed name and title